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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF EMILOU MACLEAN
IN SUPPORT OF PLAINTIFFS'
EMERGENCY ADMINISTRATIVE
MOTION TO SHORTEN TIME AND SET
BRIEFING SCHEDULE**

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1 I, Emilou MacLean, declare:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of
3 California. I am a Senior Staff Attorney at ACLU Foundation of Northern California, counsel of
4 record in this action for Plaintiffs. I make this declaration in support of Plaintiffs' Emergency
5 Administrative Motion to Shorten Time and Set Briefing Schedule. I have personal knowledge of the
6 following facts and, if called as a witness, I could and would testify competently as follows.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of the USCIS webpage
8 regarding Venezuela's TPS designation as it appeared on Tuesday, September 9, 2025 at 19:56
9 GMT.

10 3. On Monday, September 8, 2025, I emailed Defendants' counsel to confirm that
11 Defendants would update the USCIS webpage concerning Venezuela's TPS designation in light of
12 this Court's September 5, 2025 order (ECF 279). Defendants' counsel responded that: "The website
13 will not be updated today. Defendants are assessing their obligations under Judge Chen's ruling,
14 which did not include any injunctive order to immediately update the website. Defendants also note
15 they have moved for a stay of judgment pending appeal, which has yet to be ruled upon by the
16 Court." On September 9, 2025, I responded and informed Defendants that Plaintiffs would move for
17 Defendants' compliance with this Court's September 5, 2025 Order and requested Defendants'
18 position on Plaintiffs' forthcoming motion. Defendants' counsel responded: "Defendants dispute the
19 allegations of noncompliance and will oppose both the motion for compliance as well as any
20 associated motion to shorten time." A true and correct copy of this email exchange is attached as
21 **Exhibit B**.

22 4. Attached hereto as **Exhibit C** is a true and correct copy of the USCIS webpage
23 regarding Haiti's TPS designation as it appeared on Tuesday, September 9, 2025 at 21:17 GMT.

24 I declare under penalty of perjury that the foregoing is true and correct, and that this
25 declaration was executed in San Francisco, California this 9th of September, 2025.
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1 I declare under penalty of perjury that the foregoing is true and correct, and that this
2 declaration was executed in Claremont, California this 9th day of September, 2025.

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4 /s/Emilou MacLean

5 Emilou MacLean
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